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DAN F. ARNETT
CHIEF OF STAFF

April 11, 2006

Len S. Anthony, Esquire
Progress Energy Services Company
PO Box 1551/PEB 17A4
Raleigh, NC 27602

RE: Annual Review of Base Rates for Fuel Costs of Carolina Power and Light
Company d/b/a Progress Energy Carolinas, Incorporated
Docket No. 2006-1-E

Dear Mr. Anthony:

Please find enclosed and served on you the Office of Regulatory Staff's Second Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Wendy B. Cartledge

Wendy B. Cartledge

NSE/pjm

Enclosure

cc: Mr. Charles L.A. Terreni

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2006-1-E

IN RE:

Carolina Power & Light Company d/b/a)	
Progress Energy Carolinas, Inc.)	CERTIFICATE OF SERVICE
Annual Review of Base Rates for Fuel Costs)	

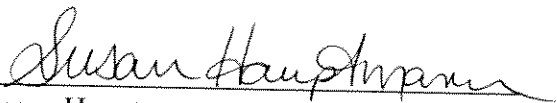
This is to certify that I, Susan Hauptman, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **SECOND SET OF CONTINUING DATA REQUESTS** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Len S. Anthony, Esquire
Progress Energy Services Company
PO Box 1551/PEB 17A4
Raleigh, NC 27602

Scott Elliott, Esquire
Elliott & Elliott, PA
721 Olive Street
Columbia, SC, 29205

Garrett A. Stone, Esquire
Brickfield, Burchette, Ritts & Stone, PC
1025 Thomas Jefferson St., NW
8th Floor West
Washington, DC 20007

Robert R. Smith, II, Esquire
Moore & Van Allen, PLLC
100 North Tryon Street, Ste. 4700
Charlotte, NC 28202


Susan Hauptman

April 11, 2006
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2006-1-E

IN RE: Carolina Power & Light Company)	SECOND SET OF CONTINUING DATA REQUESTS
d/b/a Progress Energy Carolinas, Inc.)	
Annual Review of Base Rates)	
for Fuel Costs)	
_____)	

**TO: LEN S. ANTHONY, ATTORNEY FOR PROGRESS ENERGY CAROLINAS,
INC.:**

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves its Second Set of Continuing Data Requests upon Progress Energy Carolinas, Inc. (hereafter referred to as "PEC").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" or "provide" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to PEC's South Carolina Electric Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay R. Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.

- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That PEC provides six (6) paper copies/binders of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that PEC provides an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of PEC's responses, the PEC witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require PEC to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 2-1 Is PEC or any of PEC's affiliates currently under any investigation by the Federal Energy Regulatory Commission ("FERC") that would have an impact on PEC's fuel costs for the actual period under review in this docket?
- 2-2 If the response to Data Request 2-1 is affirmative, please provide copies of any correspondence or other materials provided to FERC as well as any correspondence from FERC to PEC or to any PEC affiliate.
- 2-3 Provide copies of any settlement agreements executed by PEC or any PEC affiliate and FERC exclusive of any municipal, cooperative and public power agreements that would have an impact on PEC's fuel costs for the actual period under review in this docket.
- 2-4 Provide copies of any settlement agreements executed by PEC or any PEC affiliate that would have an impact on PEC's fuel costs for the actual period under review in this docket.
- 2-5 Provide copies of any orders issued by a court of law or by a regulatory agency that would have an impact on PEC's fuel costs for the actual period under review in this docket.

- 2-6 Has PEC or any of PEC's affiliates been assessed any fines or penalties by any regulatory agency that would have an impact on PEC's fuel costs for the actual period under review in this docket?
- 2-7 Identify any lawsuits the outcome of which may have an impact on PEC fuel costs and provide a brief description of the litigation.

Wendy B. Cartledge
Nanette S. Edwards, Esquire
Wendy B. Cartledge, Esquire
South Carolina Office of Regulatory Staff
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Columbia, SC 29201
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April 10, 2006